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July 5, 2023

**Via ECF**

Hon. Edgardo Ramos  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Dunphy v. Giuliani et al.*, Case No. 23-cv-05026-ER;  
Response to Request for Adjournment**

Dear Judge Ramos:

We write on behalf of Plaintiff Noelle Dunphy in response to Defendants' request to adjourn the pre-motion conference scheduled for tomorrow.

While we understand and appreciate that Defendants' counsel has a potential conflict, depending on the length of his appearance in another case, we have limited availability tomorrow and held our calendars open for this conference. Specifically, my co-counsel, Sharon Stiller, has a preexisting conflict on another matter requiring her to be in court at 1:30 p.m. that will likely go for most of the afternoon. We are reluctant to suggest adjourning the conference for any length of time. Therefore, we respectfully request that if the Court has the availability and inclination to grant Defendants' request, the pre-motion conference be adjourned to no later than 12:00 p.m. tomorrow or that opposing counsel work with the court on the conflicting matter to permit us to hold the conference as scheduled.

We thank the Court for its attention to this matter.

Respectfully submitted,

*/s/ Justin T. Kelton*

Justin T. Kelton